

ATTACHMENT B-1

(PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS FOR THE JURY)

1. Do you know or recognize, the plaintiff, the defendant, or any of their attorneys? If yes, please identify the person and state whether that relationship would affect your ability to give a fair trial to all of the parties in this case.
2. Have you ever attended a protest or demonstration?
3. Have you ever challenged, protested against, commended, praised, or otherwise commented upon the actions of a law enforcement officer by communicating directly with the officer or a member of his or her police department? If so, what was the outcome of your communication?
4. The law permits a citizen to be awarded monetary damages if it is proven that a police officer violated a clearly established constitutional right. Are you comfortable awarding monetary damages in this case if it is proven that either of the Defendants violated the Plaintiff's constitutional rights?
5. Do you have any personal political belief or previous experience with law enforcement officers that might weigh upon your mind as you deliberate in this case? If so, please describe that experience.
6. Even if you find that your personal politics or beliefs may influence you, are you confident that you can put those beliefs aside and make a judgment based only on the evidence and testimony that is presented to you in court?
7. Have you, or someone you know, ever been employed by any law enforcement

agency? If so, please describe the person employed, how you know them, and the capacity in which they worked.

8. Have you ever held an elected or appointed position with any local, state, or federal government? If so, name the position and the approximate time period during which you served.
9. Do you have any formal legal training? If so, please describe your experience.
10. Have you or an immediate family member ever participated in any group concerned with crime prevention or victims' rights? Please explain.
11. Where do you get your news? What television, radio, print, or internet sources do you rely upon to learn about recent events?
12. What websites do you visit on a daily basis?
13. Would service as a juror in this matter impose any special hardship or inconvenience upon you?
14. Do you believe that as a general rule, individuals should be held accountable for their actions?
15. Do you have any personal experience with a person who has been diagnosed with schizophrenia or bipolar disorder?
16. Do you have any education or training as it relates to mental health or mental disorders?
- 17.